

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

v.

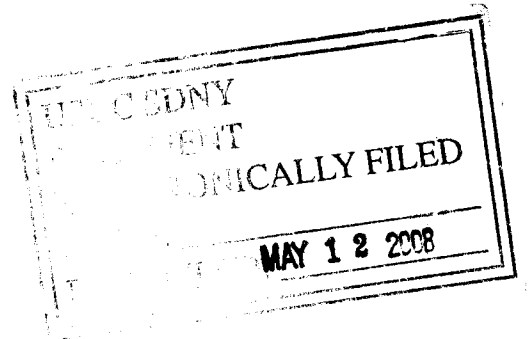
ANGELA HUANG,  
a/k/a "Angela Hung,"  
a/k/a "Angela Lu,"  
ZHI JUN HUANG, and  
FUYIN HUANG,

Defendants.

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SUPERSEDING INDICTMENT

S2 06 Cr. 1006 (RJS)



COUNT ONE

The Grand Jury charges:

1. From on or about May 17, 2006, up to and including on or about July 26, 2006, in the Southern District of New York and elsewhere, ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," ZHI JUN HUANG, and FUYIN HUANG, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other, to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 2320.

2. It was a part and an object of the conspiracy that ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," ZHI JUN HUANG, and FUYIN HUANG, the defendants, and others known and unknown, unlawfully, willfully, and knowingly would and did traffic and attempt to traffic in goods, and did use a

counterfeit mark on and in connection with such goods knowing that a counterfeit mark has been applied thereto, the use of which is likely to cause confusion, to cause mistake, and to deceive, in violation of Title 18, United States Code, Section 2320.

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about May 17, 2006, ZHI JUN HUANG filled out an invoice itemizing the purchase of thirty-six counterfeit handbags by an undercover agent with the United States Secret Service for \$480.

b. On or about June 7, 2006, ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," directed an undercover Secret Service agent to the corner of 29<sup>th</sup> Street and 7<sup>th</sup> Avenue to pick up a bag filled with counterfeit handbags.

c. On or about July 26, 2006, FUYIN HUANG, the defendant accepted payment of a \$1,000 deposit from an undercover agent with the United States Secret Service for a purchase of 1,020 counterfeit handbags.

(Title 18, United States Code, Section 371.)

**COUNT TWO**

The Grand Jury further charges:

4. From on or about May 17, 2006, up to and including on or about July 26, 2006, in the Southern District of New York and elsewhere, ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," ZHI JUN HUANG, and FUYIN HUANG, the defendants, unlawfully, willfully, and knowingly, did traffic and attempt to traffic in goods, and did use a counterfeit mark on and in connection with such goods knowing that a counterfeit mark has been applied thereto, the use of which is likely to cause confusion, to cause mistake, and to deceive, to wit the defendants sold over 1,100 counterfeit handbags out of a store located on 146 West 129th Street, New York.

(Title 18, United States Code, Sections 2320 and 2.)

**FORFEITURE ALLEGATION**

5. As a result of conspiring to commit the counterfeit goods offense, as alleged in Count One of this Indictment, in violation of Title 18, United States Code, Section 371, ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," ZHI JUN HUANG, and FUYIN HUANG, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes

or is derived from proceeds traceable to the commission of the offense.

Substitute Asset Provision


6. If any of the forfeitable property described in paragraph 5, above, as a result of any act or omission of the defendants:

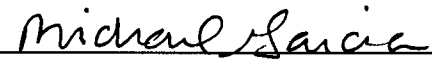
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;  
or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18,

United States Code, Section 982(b), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(c), 371, Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

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SUPERSEDING INDICTMENT

S2 06 Cr. 1006 (RJS)  
(18 U.S.C. §§ 371, 2320, 2.)

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MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

*Sherry Picchioni*

Foreperson.

5/12/06 Filed indictment.  
of Mag. Judge lat